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The Washington Chapter of the American Institute of Architects

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April 14, 2015

Anthony Hood
Chairman
DC Zoning Commission
441 4th Street NW, Suite 200 South
Washington, DC 20001

Re Zoning Case No 14-13

Dear Chairman Hood and the D C Zoning Commission

Thank you for the opportunity to provide comment on the text amendments related to rooftop penthouses. As you may recall, the Chapter was quite interested in the height of penthouses recommending in testimony and in subsequent additional materials that the height be raised to 20 feet from its current 18.5 feet.

We have reviewed the extensive changes included in the text amendment and are in general agreement with 95 percent to the proposed changes. We offer the following comments that we believe will improve the final changes.

1. Keep it simple

In several places there are alternative text options. We would encourage adopting the alternative that is broader and allows more interpretation. For example in section 400.7 there are two versions of what might occur within a 20-foot penthouse: the first just allows two stories of habitable or mechanical space and the second is more proscriptive – one story of habitable space and one story of mechanical space. It would seem that having the more proscriptive language would be a small nightmare to enforce with little added value. How would having more habitable space harm the public interest? Similar proscriptive language is included in Section 411, as well, and should be removed.

2. Equal Height for enclosing walls is not necessary

Section 411 includes several alternatives of mechanical enclosures: one enclosure with walls of equal height, all mechanical equipment in one enclosure except for emergency egress stairs, penthouse walls of equal height but the mechanical enclosure can have second uniform height OR delete the requirement that the walls be of equal height. We support the last alternative. As we said in our testimony, enclosures of equal height can be unrelievedly monolithic – particularly on larger buildings. Deleting the requirement would permit better designed rooftops and a more pleasing skyline.

Thank you for the opportunity to comment on these important zoning text changes.

Sincerely,



Mary Fitch, AICP, Hon. AIA
Executive Director



ZONING COMMISSION
District of Columbia
Steven White, AIA
President
CASE NO. 14-13

EXHIBIT NO. 66
ZONING COMMISSION
District of Columbia
CASE NO. 14-13
EXHIBIT NO. 66

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